

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

ROXANN HALL, on behalf of herself and  
all other persons similarly situated known  
and unknown,

Plaintiff,

Case No. 21-cv-55-SMY

v.

MERIDIAN SENIOR LIVING, LLC

Judge Staci M. Yandle

Defendant.

**JOINT STIPULATION REGARDING DISCOVERY SCHEDULE**

Pursuant to Federal Rule of Civil Procedure 29, Plaintiff Roxann Hall (“Plaintiff”) and Defendant Meridian Senior Living, LLC (“Meridian”) (together, the “Parties”), by and through the undersigned counsel, jointly stipulate to the following revised discovery schedule to accommodate the Parties’ settlement discussions:

1. Plaintiff’s deposition(s) shall be taken no later than March 4, 2024.
2. Meridian’s deposition(s) shall be taken no later than March 4, 2024.
3. Depositions of Plaintiff’s expert(s) shall be taken no later than April 4, 2024.
4. Depositions of Meridian’s expert(s) shall be taken no later than May 6, 2024.
5. Depositions of Plaintiff’s class certification expert witnesses shall be taken by May 6, 2024.
6. Depositions of Meridian’s class certification expert witnesses shall be taken by June 6, 2024.
7. Plaintiff’s Motion for Class Certification and Memorandum in Support shall be filed no later than July 1, 2024 (such date shall be no later than 8 months prior to the first day of the month of the trial setting) and shall not exceed thirty (30) pages.

8. Meridian's Memorandum in Opposition to Class Certification shall be filed by August 1, 2024, and shall not exceed thirty (30) pages.

9. The trial date shall be set no earlier than March 1, 2025.

Dated: December 14, 2023

Respectfully submitted,

By: /s/ David M. Oppenheim (with permission)

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*Attorneys for Plaintiff Roxann Hall, individually and  
as the representative of a class of similarly situated  
persons*

By: /s/ Erin Bolan Hines

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*Attorneys for Defendant Meridian Senior Living, LLC*

**CERTIFICATE OF SERVICE**

I, Erin Bolan Hines, an attorney, hereby certify that on December 14, 2023, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk via the Court's ECF system, which will serve electronic notice on all parties of record.

*/s/ Erin Bolan Hines*

Erin Bolan Hines

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